

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION**

**J. S. (a minor child, by and through his
father and next best friend, John
Searight),**

v.

**Officer Curt Campbell,
in his individual capacity,
Defendant.**

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Civil Case No. 2:05-cv-928-W

MOTION TO AMEND COMPLAINT

COMES NOW Plaintiff J.S. (a minor child, by and through his father and next best friend, John Searight) , by and through his attorney, to move for leave to amend his Complaint and in support of which would show unto the Court as follows:

1. This motion is timely, coming as it does within the period set by the Court for amendments.
2. The amended Complaint addresses certain factual inaccuracies and omissions revealed by ongoing discovery in this case. The amended Complaint also deletes references to and reliance upon the guarantees of the Fifth and Fourteenth Amendments to the United States Constitution and deletes a count for trespass.
3. No new claims or causes of action are set forth in the amended Complaint.

WHEREFORE, the premises considered, Plaintiff prays that the Court will grant him leave to amend his Complaint by substituting therefor his Amended Complaint, attached hereto.

RESPECTFULLY SUBMITTED on this the __3rd__ day of April, 2006.

/s/ JAY LEWIS
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ASB-2014-E66J
One of the Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that I have electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the below named parties or attorneys on this __3rd__ day of April, 2006.

Alex L. Holtsford, Jr.
Rick A. Howard

/s/ JAY LEWIS
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